

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
: :
JUANA ORTIZ : CHAPTER 13
Debtor :

KINGDOM RCG EVERGREEN FUND :
SERIES I LLC :
Movant, :
: :
vs. :
JUANA ORTIZ : CASE NO. 5-22-00155
Respondents. :

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party(parties). This is a first request for a continuance

Reason for continuance: **Debtor's Counsel is in the process of reviewing proof of all mortgage payments made by the Debtor since the time the Bankruptcy case was filed. Additional time is needed to review same. Counsel for Mortgage Company consents to the continuance.**

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: November 6, 2024

/s/Tullio DeLuca
Attorney for Juana Ortiz
Name: Tullio DeLuca, Esq.
Phone No. (570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 6, 2024, he caused a true and correct copy of Debtor's Request to Continue Hearing/Trial to be served Via electronic filing on the following CM/ECF participants:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

Brent Lemon, Esq. at blemon@kmlawgroup.com

Date of Mailing: November 6, 2024

/s/Tullio DeLuca

Tullio DeLuca, Esquire